

## **REMARKS**

Applicant thanks the Examiner for considering the references cited with the Information Disclosure Statements filed February 24, 2000 and February 11, 2002.

### **Status of the Application**

Claims 1-30 are all the claims pending in the Application. Claims 1-30 have been rejected.

### **Obviousness Rejection**

The Examiner has rejected claims 1-30 under 35 U.S.C. § 103(a) as being unpatentable over W3C's "Introduction to CSS2," (<http://www.w3.org/TR/REC-CSS2/intro.html#processing-model>; hereinafter *Intro to CSS2*) in view of Hill et al. (US 6,023,714; hereinafter *Hill*). This rejection is respectfully traversed.

### **The Applied References**

*Intro to CSS2* discloses, in section 2.3 entitled "The CSS2 processing model," that a "user agent" (*i.e.*, a client application): (1) parses the source document and creates a document tree; (2) identifies the media type; (3) retrieves style sheets; (4) annotates elements of the document tree; (5) generates a formatting structure; and (6) transfers the formatting structure to the target medium.

Thus, *Intro to CSS2* discloses a system wherein a client computer applies style sheets to a parsed source document, which is similar to the deficient "relevant technology" discussed in the instant Application. Accordingly, the system disclosed in *Intro to CSS2* would suffer from the same problems as the "relevant technology" of the Application, *i.e.*, many "user agents" (*i.e.*, web browsers) do not support style sheets.

*Hill* discloses a system for dynamically adapting the layout of a document to a particular display device (*see* Abstract). More specifically, *see* FIG. 2, a client 204 renders a document 210 obtained from server 208 on an output device 200 using a presentation component, such as a web browser 206 (col. 9, lines 14-18). The document 210 contains a layout generator 212 that interrogates the display device 200 and selects a style sheet 214 based upon the capabilities of the display device 200. (col. 9, lines 23-26). Once the correct style sheet 214 is selected, the style sheet and document are transmitted to the client 204, and the client 204 uses the style sheet to render the document 210 on the display device 200 (col. 9, lines 50-54).

Thus, although a specific style sheet is chosen by the layout generator 212, the style sheet is not applied to the document 210 in server 208, but is rather applied to the document by client 204, as shown by steps 414 and 512 in FIGS. 4 and 5, respectively.

#### Independent Claims

The Examiner takes the position that *Intro to CSS2* discloses many of the features recited in the independent claims, but fails to teach or suggest “that customizing a requested document is done on the server side.”

Nevertheless, the Examiner applies *Hill*, taking the position that this reference discloses “that customizing the requested document can be done on the server side as well as the client side (column 2, lines 30-34)” (*see* Office Action, pg. 3, lines 2-3). Additionally, the Examiner alleges that one of skill would have been motivated to modify *Intro to CSS2* with *Hill* because “it was well known in the art that some end-user client devices do not support cascading style-sheet processing” (*see* Office Action, pg. 3, lines 6-7).

*The Applied References Do Not Support The Examiner's Proffered Motivation*

The Examiner cites no particular basis for his allegation that “it was well known in the art that some end-user client devices do not support cascading style-sheet processing.” Such disclosure is simply not found in either of the applied references, as client processing of style sheets is precisely what these references are directed to.

Accordingly, Applicants respectfully submit that the Examiner's proffered motivation is unsupported, and the instant rejection is invalid.

*No Reasonable Combination of Intro to CSS2 and Hill Teaches or Suggest The Features of the Independent Claims*

Additionally, even if it were possible to modify *Intro to CSS2* with *Hill* as the Examiner has alleged, Applicants respectfully submit that even the resultant combination would fail to teach or suggest any application of any rule of a style sheet to a document or DOM in a “document server” (claim 1), or in a “system for customizing a requested document for sending to a target device” (claim 11) or in a “a program storage medium” embodying instructions to perform a “method for customizing a requested document for sending to a target device”(claim 22).

As an initial matter, the Examiner has conceded that *Intro to CSS2* fails to teach or suggest customization of a requested document anywhere other than in a client browser. Thus, the disclosure of such customization outside the client browser must be found in *Hill* to support the rejection.

However, Applicants respectfully submit that, although *Hill* does disclose the selection of a relevant style sheet by the layout generator for transmission to a client, the actual application of

that style sheet to the requested document is performed on the client side (see, for example, steps 414 and 512 in FIGS. 4 and 5, respectively).

Thus, Applicant respectfully submits that independent claims 1, 11 and 21 are patentable over the applied references. Further, Applicant respectfully submits that rejected dependent claims 2-10, 12-20 and 22-30 are allowable, *at least* by virtue of their dependency.

Thus, Applicant respectfully requests that the Examiner withdraw this rejection.


**Conclusion**

In view of the foregoing, it is respectfully submitted that claims 1-30 are allowable. Thus, it is respectfully submitted that the application now is in condition for allowance with all of the claims 1-30.

If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

Please charge any fees which may be required to maintain the pendency of this application, except for the Issue Fee, to our Deposit Account No. 19-4880.

Respectfully submitted,



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